

Drip Torches in Accordance with DOT's Materials of Trade Exemption

1. Type: Traditional drip torch fabricated in accordance with DOT Performance Oriented Packaging standard UN 3B1. Existing supplies of drip torches that do not meet the DOT packaging standard may continue to be used in accordance with the requirements of this document. All torches purchased after the date of this IM must be for drip torches that comply with DOT packaging standard UN 3B1. The following vendors are actively working to bring their drip torch fabrication up to DOT standards: Cascade Fire Equipment (800 654-7049), <http://www.cascadefire.com/products/tools/toolsapparatus.htm>, Wildfire (800 426-5207), <http://www.wildfire-equipment.com/>, and KCR Manufacturing, Inc. (503 281-8346), <http://www.kcrmanufacturing.com/>. Other companies may also be working on improving their torch design. DOT compliant torch should be commercially available by the end of April 2003. Contact your torch supplier for the latest information.
2. Size: 1.25-gallons.
3. Maximum Number of Full Drip Torches that Can Be Transported: 34 full drip torches can be transported assuming no other hazardous materials are being transported. [Note: An empty drip torch that contains fuel residue weighs approximately five-pounds, full it weighs 12.875-pounds. Unless an empty container has been purged, its weight must be included in the total weight of hazardous material being transported.] If hazardous materials other than drip torches are transported (e.g., safety cans, fusees, saw gas) are also being transported, the number of drip torches being transported must be reduced to ensure the total weight of all hazardous materials being transported is less than 440-pounds.

A limit of 34 full drip torches is necessary to ensure compliance with DOT's Materials of Trade Exemption. In accordance with the exemption, the only DOT requirements are as follows: 1) hazardous materials must be labeled with their common or proper shipping name, 2) total weight of hazardous materials being shipped cannot exceed 440-pounds, 3) maximum container size is eight gallons, 4) fuel is transported in a safety can that complies with OSHA regulation 29 CFR 1910.106(d)(2) or a DOT specification container, and 5) vehicle operator must be informed of the presence of hazardous materials they are transporting and the exemption requirements. Under this exemption, preparation of shipping papers and other DOT regulations are not applicable. If more than the recommended maximum number of drip torches or more than 440-pounds of hazardous material is transported, compliance with all DOT regulations regarding marking, labeling, placarding, and shipping papers is required.
4. Location: Within the truck bed outside of impact zone. Torches shall not be mounted on bumpers of any vehicle or engine.
5. Securing: Drip torches to be secured against movement within the confines of the truck bed.
6. Drip Torch Filling: Torches must be removed from truck and placed directly on ground prior to filling.

7. Fire Protection: 2A 10 B:C extinguisher to be located outside of truck bed and cab within reach of torch filling area before dispensing fuel.
8. Torch Inspection Criteria: Torch to be visually inspected prior to filling and be replaced and properly disposed of if one or more of the criteria is met;
 - a. Permanent convex bulging of the torch.
 - b. Gaps, bulges, or seam separations.
 - c. Any visible leaking or seepage around welds or body. Replace gaskets and O-rings if there is leakage around fittings.
9. Marking: DOT exemption for marking to be requested. At this time markings will not be required.
10. Labeling: Torches must have diamond shape "FLAMMABLE LIQUID" label on them. The label has a red background with white text. The label design is shown in 49 CFR 172.419. New torches made in accordance with DOT specification UN 3B1 will be properly labeled by their manufacturer. Maintain or replaced label as necessary. The torch cannot have any old labels on it that may obscure or reduce the effectiveness of this label.
11. Phase-out of Non-DOT Compliant Drip Torches: Drip torches that do not have markings from their manufacturer that they were fabricated in accordance with UN 3B1 standards must be replaced within 10-years of the issuance of this policy. In general, this applies to all drip torches purchased prior to May 2003, assuming the vendors identified in this document are selling compliant torches by then.